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4-8-2008MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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FILED**MAY 27, 2008**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Plaintiff(s)

Adenike Adebiyi

08CV1996

v.

JUDGE COAR

Defendant(s)

MAGISTRATE JUDGE SCHENKIER

Officer Warner Biedenharn ^{and} CVS pharmacy

and Chicago Heights Police Department, Officer

Tom Rogers of Chicago Heights Police Department,

Mr. Timothy Felgenhauer States Attorney

Complaint

On April 9 2005, Ms. Adebiyi (Plaintiff) drove her daughter Temidayo Adebiyi to a CVS pharmacy in Chicago Heights. Officer Warner Bierdenharm was working as a security officer in the store and confronted the plaintiff in the parking lot. The plaintiff was parked in an unmarked lot in front of the store. During the confrontation officer stuck his middle finger at the plaintiff and the plaintiff repeated the act to the officer. The officer later called back up and arrested the plaintiff and her children who were minors. Plaintiff made two 911 calls to the Chicago Heights police department to report the conduct of these police officers using telephone number 708-828-2691. The plaintiff was reassured that help was on the way. The officers that reported to the scene decided to arrest the plaintiff and in the process the plaintiff was searched on the street by Officer Tom Rogers. The plaintiff told the police officers about her medical condition prior to the arrest. The plaintiff has a shoulder that has been reduced during a prior surgery. However, during the arrest, the officers did something to the plaintiff that made the plaintiff to be unconscious. The officers then called 911. The plaintiff's daughter was handcuffed and taken to jail and the son was also taken to the prison. The plaintiff has had another surgery on this shoulder since this incident. The police and the CVS pharmacy manager, Ms. Osfetcia Maghn, said that the plaintiff had a seizure. The plaintiff was handcuffed and arrested at St. James Hospital in Chicago Heights when she signed out against medical advice after Mr. Felgenhauer told her that her children have been taken to prison, and assisted with handcuffing the plaintiff. Mr. Felgenhauer is a State's Attorney. The plaintiff suffered emotionally, physically, and financially as a

result of this arrest. The plaintiff was falsely arrested and subsequently charged for a crime that was claimed to have happened during the period in which the plaintiff was unconscious. The plaintiff was not told of her crime until she was in jail the night of the arrest. Mr. Timothy Felgenhauer was in the Chicago Heights jail where the plaintiff was that night with another inmate that was booked on prostitution charges. The arrest was false and the incident has caused the plaintiff physical, emotional, and financial hardship as the plaintiff, a doctorate student, feels she has been blackmailed and labeled by the state of Illinois.

Plaintiff: Adenike Adebiyi

April 8, 2008

